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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARTHUR ANGERMEIR, NITESH BHAGWANANI,  
KEN ELDER, BECKY D. GLYNN, RAJAT GOYAL,  
KRISTINA GREENE, LOUIS MARROU, MARILYN  
MURRELL, AND DR. SHIVA NANCY SHABNAM,

Plaintiffs,  
– against –

JAY COHEN, SARA KRIEGER, JENNIFER CENTENO,  
LOUIS CUCINOTTA, RICARDO BROWN, ROBERT  
TAYLOR, JOSEPH I. SUSSMAN, JOSEPH I.  
SUSSMAN, P.C., LEASE FINANCE GROUP, LLC, MBF  
LEASING LLC and NORTHERN LEASING SYSTEMS,  
INC.,

Defendants.

12 Civ. 0055 (KBF)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the Court's Order, dated March 31, 2015 (ECF No. 98), and the Declaration of Robert Lillienstein, dated April 7, 2015 (with exhibits), the undersigned counsel for Defendants moves this Court, before the Honorable Katherine. B. Forrest, U.S.D.C. J., in Courtroom 15A at the United States Courthouse located at 500 Pearl St., New York, NY 10007, for and Order:

(1) Entering a judgment dismissing all claims asserted in this action by Plaintiff Arthur Angermeir, with prejudice, together with costs and disbursements to Defendants;

(2) Awarding defendant/counterclaimant MBF Leasing LLC (“MBF”) a money judgment in its favor and against Arthur Angermeir for \$3,680, plus interest from February 1, 2009 on MBF’s counterclaim against Arthur Angermeir;

(3) Scheduling an inquest to calculate the attorneys’ fees and expenses to which MBF is contractually entitled on its counterclaim against Arthur Angermeir;

(4) Awarding Defendants fees and costs they have incurred as of March 6, 2015 in connection with Mr. Angermeir’s failure to produce initial disclosures, including the fees and costs associated with bringing the issue to the Court’s attention; and,

(5) granting such other and further relief as the Court deems just.

Dated: April 7, 2015  
New York, New York

/s/  
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